

1 Thomas J. Nolan (SBN: 48413)

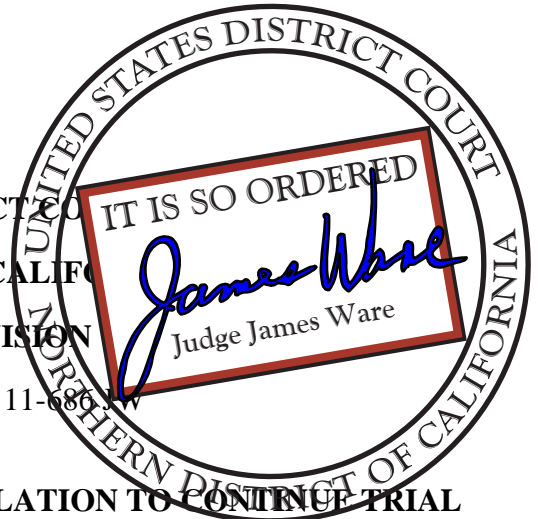


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& Barton, LLP

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5 Attorney for Defendant  
6 Sharon Wang

7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**



11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 SHARON WANG, HEATHER YIN,

15 Defendants.

No. CR 11-686-JW

**STIPULATION TO CONTINUE TRIAL  
SETTING HEARING AND TO EXCLUDE  
TIME; ORDER ~~PROPOSED~~**

Date: Monday, November 28, 2011  
Time: 1:30 p.m.

Before The Honorable James Ware

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17  
18 The government, Sharon Wang, and Heather Yin stipulate to continue the Trial Setting  
19 Hearing currently scheduled for Monday, November 28, 2011 at 1:30 p.m. for approximately sixty  
20 days, until Monday, January 30, 2012. This continuance is requested for two reasons. First, the  
21 request is made in order to allow for the effective preparation of all attorneys in this case. The  
22 government has to date provided defense counsel with nearly 40,000 pages of documents.  
23 Discussions are ongoing, and the parties anticipate that additional documents will be provided to  
24 defense counsel by the government. Second, the request is made in order to insure continuity of  
25 counsel, as Ms. Wang's attorney, Thomas J. Nolan, was on an extended medical leave of absence  
26 beginning in October and lasting until November 14, 2011.  
27  
28

**STIPULATION TO CONTINUE TRIAL SETTING HEARING AND TO EXCLUDE TIME; ORDER  
~~PROPOSED~~; CASE NO. CR 11-686 (JW)**

1 The parties accordingly stipulate that the time between November 28, 2011 and January  
2 30, 2012 should be excluded under the Speedy Trial Act to allow for effective preparation of  
3 counsel and for continuity of counsel. See 18 U.S.C. § 3161 (h)(7)(A), 18 U.S.C. § 3161  
4 (h)(7)(B)(i), 18 U.S.C. § 3161 (h)(7)(B)(iv).

5  
6  
7 Respectfully submitted,

8 NOLAN, ARMSTRONG & BARTON, LLP

9 /s/

10 Dated: November 21, 2011

\_\_\_\_\_  
11 Thomas J. Nolan, Esq.  
12 Attorney for Defendant  
13 Sharon Wang

14 LAW OFFICES OF DORON WEINBERG

15 /s/

16 Dated: November 21, 2011

\_\_\_\_\_  
17 Doron Weinberg  
18 Attorney for Defendant  
19 Heather Yin

20 /s/

21 Dated: November 21, 2011

\_\_\_\_\_  
22 David Callaway  
23 Assistant United States Attorney

24 **ATTESTATION PER GENERAL ORDER 45**


25 I, Thomas J. Nolan, am the ECF User whose ID and password are being used to file this  
26 Stipulation. In compliance with General Order 45, X.B., I hereby attest that Doron Weinberg and  
27 David Callaway have concurred with this filing.  
28

**[PROPOSED] ORDER**

Based upon the stipulation of the parties, and good cause appearing therefor,

IT IS HEREBY ORDERED that the trial setting hearing currently scheduled to occur on Monday, November 28, 2011 at 1:30 p.m., for the captioned defendant is continued until Monday, January 30, 2012 at 1:30 p.m., and that the time between November 28, 2011 and January 30, 2012 is excluded under the Speedy Trial Act to allow for effective preparation of counsel and for continuity of counsel. *See* 18 U.S.C. § 3161 (h)(7)(A), 18 U.S.C. § 3161 (h)(7)(B)(i), 18 U.S.C. § 3161 (h)(7)(B)(iv).

Dated: November 22, 2011

  
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HON. JAMES WARE  
United States District Court Judge